

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

-against-

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

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In re:

BERNARD L. MADOFF,

Debtor.
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**STIPULATION SETTING BRIEFING SCHEDULE ON MOTION OF KHRONOS LLC
TO QUASH THE TRUSTEE’S FED. R. BANKR. P. 2004 SUBPOENA**

IT IS HEREBY STIPULATED AND AGREED, by and between Khronos LLC (“Khronos”), on the one hand, and Irving H. Picard (the “Trustee”), as trustee for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa *et seq.* (“SIPA”), and the substantively consolidated estate of Bernard L. Madoff, on the other hand, in each case by and through their respective attorneys, as follows:

WHEREAS, on August 18, 2020, Khronos filed a motion to quash (the “Motion to Quash”) the subpoena issued to Khronos by the Trustee pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure; and

WHEREAS, the Motion to Quash is scheduled to be heard by the Court via telephonic conference on September 9, 2020, at 10:00 a.m. Eastern Time;

NOW, IT IS HEREBY STIPULATED AND AGREED, by the undersigned that:

1. The deadline for the Trustee to file a response to the Motion to Quash is **September 1, 2020**.
2. The deadline for Khronos to file a reply to the Motion to Quash, if any, is **September 7, 2020 at 5 p.m. Eastern Time**.
3. This Stipulation may be signed in any number of counterparts and a signature made by a facsimile or electronic copy shall have the same force and effect as an original signature.

Dated: New York, New York
August 18, 2020

BAKER & HOSTETLER LLP

/s/ Jason S. Oliver
David J. Sheehan
Oren J. Warshavsky
Jason S. Oliver
45 Rockefeller Plaza
New York, New York 10111
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*Attorneys for Irving H. Picard, Trustee for
the Substantively Consolidated SIPA
Liquidation of Bernard L. Madoff
Investment Securities LLC and the chapter
7 estate of Bernard L. Madoff*

Dated: New York, New York
August 19th, 2020

BINDER & SCHWARTZ LLP

/s/ Eric B. Fisher
Eric B. Fisher
Lindsay A. Bush
Tessa B. Harvey
366 Madison Avenue, 6th Floor
New York, New York 10017
Tel: (212) 510-7008

Attorneys for Khronos LLC

SO ORDERED:

/s/ STUART M. BERNSTEIN
HON. STUART M. BERNSTEIN
UNITED STATES BANKRUPTCY JUDGE